

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED.

Otto A. Baumgarten

UNITED STATES OF AMERICA)
v.)
CHRISTOPHER SULLIVAN)
No. 3:13-00086
Aleta A. Trauger
Judge, U.S. District Court

**CHRISTOPHER TROY SULLIVAN'S MOTION TO
CONTINUE THE TRIAL OF HIS CASE**

COMES now, the accused, **CHRISTOPHER TROY SULLIVAN**, through counsel, Assistant Federal Public Defender, Isaiah S. Gant and moves this Honorable Court to enter an Order continuing the trial in this matter, presently scheduled to commence on Tuesday, May 13, 2014 at 9:00 a.m. In support of the foregoing motion, it is respectfully represented to this Honorable Court the following:

1. Counsel for Mr. Sullivan under went surgery on both feet on April 9, 2014. It has been estimated that counsel's recuperative period could be anywhere between six (6) to eight (8) weeks.
2. Counsel for Mr. Sullivan requests that the Court continue this matter to a date compatible with the Court's calender, but not less than sixty (60) days from the present trial date, to permit counsel to adequate time to prepare either for trial and/or to continue to pursue a negotiated settlement of this matter.
3. An executed Speedy Trial Waiver prepared pursuant to the Middle District of Tennessee's *Plan for the Prompt Disposition of Criminal Cases* will be filed immediately upon receipt.
4. Counsel has conferred with counsel for the government, Assistant United States Attorney, Lynne T. Ingram, and she has granted counsel for Mr. Sullivan the liberty of advising the Court that the government does not oppose this request.